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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NS UNITED KAIUN KAISHA, LTD.,

Petitioner,

v.

COGENT FIBRE INC.,

Respondent.

15 Civ. 01784 (PAE)

**NOTICE OF MOTION ON PETITION TO
RECOGNIZE AND ENFORCE
ARBITRATION AWARD**

PLEASE TAKE NOTICE that upon the annexed petition of NS UNITED KAIUN KAISHA, LTD., (“Petitioner”), and upon the accompanying Memorandum of Law and Affidavit of Richard V. Singleton, both dated March 11, 2015, the undersigned will move this Court, pursuant to 9 U.S.C. §§ 1-16 and 201 *et seq.*, before the Honorable Paul A. Engelmayer, at Courtroom 1305, United States District Court, 40 Foley Square, New York, NY 10007 for an order confirming and entering judgment upon Petitioner’s arbitration award against Respondent COGENT FIBRE INC., formerly known as “Cogent Fibre LLC”, dated January 23, 2015, which is annexed to the Petition, and awarding Petitioner its attorneys’ fees and costs in this action and for such other and further relief as the Court may deem proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1, opposing papers are required to be served within 14 days after service of the moving papers and reply papers, if any, shall be served within 7 days after service of the answering papers.

Dated: New York, New York
March 11, 2015

Respectfully submitted,

BLANK ROME, LLP

By: 

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